

March 17, 2021

VIA ECF

Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

RE: Allen et al. v. City of New York, et al.; Docket No. 1:19-cv-03786 (WHP)

Dear Judge Pauley:

The parties write jointly to provide the Court with an update regarding discovery and to respectfully request a brief adjournment of one month for the upcoming deadlines to enable the parties to engage in court-ordered mediation prior to incurring significant additional costs.

After our last submission to Your Honor, the parties completed the remaining 30(b)(6) depositions by February 10, 2021, as required. Since then, the parties have engaged in post-deposition discovery exchanges and worked with the Court-ordered mediator to set a mediation schedule that is mutually agreed-upon and we hope will be conducive to a productive mediation.

Therefore, the parties respectfully request that the Court approve the following schedule:

- Court-ordered mediation session shall be held on April 15, 2021;
- Plaintiffs shall serve their expert report by May 17, 2021;
- Defendants shall serve their rebuttal expert report by June 17, 2021;
- Expert depositions shall be completed by July 16, 2021;
- Plaintiffs shall file their motion for class certification by August 20, 2021;
- Defendants shall file their opposition to class certification by October 4, 2021;
- Plaintiffs shall file their reply for class certification by November 1, 2021;
- Oral argument on class certification to be adjourned to a date set by the Court.

This is the second request for an adjournment of these remaining deadlines since the discovery schedule was re-set after the Court's October 20, 2020 Order [ECF No. 41].

Thank you in advance for your time and attention to this matter.

Respectfully Submitted,

/s/ Erica T. Healey-Kagan

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